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10 UNITED STATES BANKRUPTCY COURT
11 DISTRICT OF OREGON

12 In re

13 Van's Aircraft, Inc.,

14 Debtor.
15

Case No. 23-62260-dwh11

**STIPULATED MOTION FOR ENTRY
OF STIPULATED ORDER
EXTENDING DEADLINE TO OBJECT
TO CLAIM NO. 354 (SCOTT
SCHIEBLE)**

16
17 Van's Aircraft, Inc. ("Van's") and Scott Schieble move this Court for entry of a
18 stipulated order extending the deadline for Van's to object to Claim No. 354 of Scott Schieble
19 ("Claim 354") to September 30, 2024, as set forth below, and state as follows:

20 1. The Court entered its Order Confirming Debtor's Plan of Reorganization Pursuant
21 to 11 U.S.C. § 1191(b) [ECF No. 143] on May 16, 2024 (the "Plan"). The Plan became effective
22 on June 1, 2024 (the "Effective Date").

23 2. The Court entered an Order on August 14, 2024 [ECF No. 254] granted the
24 parties first Stipulated Motion for Entry of Stipulated Order Extending Deadline to Object to
25 Claim No. 354 (Scott Schieble) [ECF No. 230], which extended the claim objection deadline, as
26 it pertains to Claim 354, to August 30, 2024.

3. The parties have been conferring, and desire the opportunity to continue to confer on a resolution of the Claim prior to initiation of the claim objection process.

4. Van's certifies that, for the reasons set forth herein, the requested extension is in good faith, Van's appropriately used the prior time, and that the continuance is being requested at the earliest time practical. Van's and Mr. Schieble have agreed to stipulate to an extension of the claim objection deadline, as it pertains to Claim 354, to September 30, 2024.

5. Attached hereto as **Exhibit 1** is a proposed Stipulated Order Extending Deadline to Object to Claim No. 354 (Scott Schieble).

6. WHEREFORE, the parties pray this Court enter the Stipulated Order Extending Deadline to Object to Claim No. 354 (Scott Schieble).

DATED: August 26, 2024.

TONKON TORP LLP

By /s/ Timothy J. Conway

Timothy J. Conway, OSB No. 851752
Michael W. Fletcher, OSB No. 010448
Ava Schoen, OSB No. 044072
Attorneys for Debtor

IT IS SO STIPULATED:

TONKON TORP LLP

By /s/ Timothy J. Conway

Timothy J. Conway, OSB No. 851752
Michael W. Fletcher, OSB No. 010448
Ava Schoen, OSB No. 044072
Attorneys for Debtor

By /s/ Scott Schieble

Scott Schieble
Claimant

EXHIBIT 1

Proposed Form of Stipulated Order

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re

Van's Aircraft, Inc.,

Debtor.

Case No. 23-62260-dwh11

**STIPULATED ORDER EXTENDING
DEADLINE TO OBJECT TO CLAIM
NO. 354 (SCOTT SCHIEBLE)**

THIS MATTER having come before the Court upon the Stipulated Motion for Entry of Stipulated Order Extending Deadline to Object to Claim No. 354 (Scott Schieble) [ECF No. ____] (the "Motion"), and the Court having reviewed the Motion and otherwise being duly advised in the premises; NOW, THEREFORE,

IT IS HEREBY ORDERED that the deadline for Van's Aircraft, Inc. to object to Claim No. 354 of Scott Schieble is extended to September 30, 2024.

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I certify that I have complied with the requirements of LBR 9021-1(a).

Presented by:

TONKON TORP LLP

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IT IS SO STIPULATED:

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Michael W. Fletcher, OSB No. 010448
Ava Schoen, OSB No. 044072
Attorneys for Debtor

By _____
Scott Schieble
Claimant